

**THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**JUANITA MCLAUGHLIN,**

**Plaintiff,**

**v.**

**ZIRCOA INC.,**

**Defendant.**

**CASE NO.**

**JUDGE**

**NOTICE OF REMOVAL**

**EXHIBIT A  
Complaint and Summons**

SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER  
CLEVELAND, OHIO 44113

CASE NO.  
CV13814290

D1 CM

SUMMONS NO.  
22004832

Rule 4 (B) Ohio

Rules of Civil  
Procedure

JUANITA MCLAUGHLIN  
VS  
ZIRCOA, INC

PLAINTIFF  
DEFENDANT

SUMMONS

ZIRCOA, INC.  
31501 SOLON ROAD  
SOLON OH 44139-0000

You have been named defendant in a complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on:



Plaintiff's Attorney

STEPHAN I VOUDRIS  
8401 CHAGRIN ROAD SUITE 8  
CHAGRIN FALLS, OH 44023-0000

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Case has been assigned to Judge:

CASSANDRA COLLIER-WILLIAMS  
Do not contact judge. Judge's name is given for attorney's reference only.

ANDREA F. ROCCO  
Clerk of the Court of Common Pleas



DATE  
Sep 26, 2013

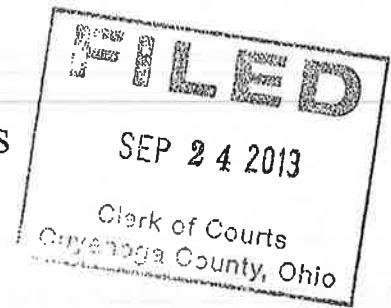
By

Deputy

COMPLAINT FILED 09/24/2013



IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO



JUANITA McLAUGHLIN  
4232 Wilson Ave.  
Ravenna, OH 44266

Plaintiff,

v.

ZIRCOA, INC.  
31501 Solon Road  
Solon, OH 44139

Defendant.

)  
) Civil Action No.  
Judge: CASSANDRA COLLIER-WILLIAMS  
CV 13 814290

)  
)  
) COMPLAINT FOR IMPROPER  
) DENIAL OF DISABILITY  
) INSURANCE BENEFITS  
)  
)  
)

Plaintiff Juanita McLaughlin ("McLaughlin") alleges as follows for her Complaint against Defendant Zircoa, Inc. ("Zircoa"):

1. McLaughlin worked for Zircoa, Inc. in Cuyahoga County, Ohio. She began working at Zircoa on or about February 18, 1999. She left work during her shift on Friday, June 3, 2011, and has been unable to perform her former job duties or the duties of any job since then.

2. Zircoa is the Plan Administrator for Zircoa's employee benefits plan.

3. As part of Zircoa's employee benefits plan, Plaintiff was entitled to short term and long term disability payments if she was disabled as defined by the group short term and long term insurance policies issued by United of Omaha Life Insurance Company to Zircoa (the "United of Omaha Policies").

4. Plaintiff has been totally disabled under the terms of the employee benefits plan and the United of Omaha Policies since June 3, 2011.

5. Plaintiff has timely applied for both short term and long term disability benefits, but Zircoa and United of Omaha have refused to make any such payments to her.

6. Zircoa admitted on August 23, 2011 that Plaintiff's "own serious health condition makes the employee unable to do his or her job."

7. Zircoa further admitted on Plaintiff's long term disability claim form that she stopped working because of "illness."

8. Plaintiff has exhausted all administrative remedies available to her and has complied with all conditions precedent for coverage prior to filing this lawsuit.

9. This Court has subject matter and personal jurisdiction over the claims raised in this Complaint.

10. Venue is proper in Cuyahoga County, Ohio.

11. Defendant has violated 29 U.S.C. Section 1132(a)(1)(B) in unlawfully and unreasonably denying disability benefits to Plaintiff.

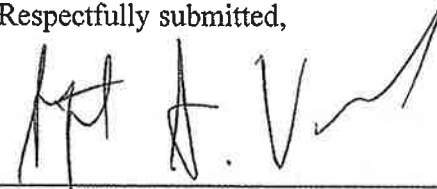
12. Defendant has abused its discretion in denying disability benefits to Plaintiff.

13. Plaintiff has suffered damages in excess of \$25,000 due to Defendant's conduct.

14. Plaintiff has hired the undersigned counsel and has agreed to pay him reasonable attorney's fees and costs if Plaintiff is successful on one or more of the claims set forth herein.

WHEREFORE, Plaintiff demands judgment against Defendant for her past and future short term and long term disability payments, prejudgment interest at the statutory rate, post-judgment interest, attorney's fees and costs as permitted under ERISA or otherwise, and all other relief to which she is entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. I. Voudris', written over a horizontal line.

Stephan I. Voudris, Esq.  
Supreme Court No. 0055795  
Voudris Law LLC  
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Chagrin Falls, OH 44023  
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440-543-0670  
440-543-0721 (fax)

Counsel for Plaintiff